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VIA ECF

The Honorable Jeannette A. Vargas
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007
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VargasNYSDChambers@nysd.uscourts.gov

**Re: *Drew Dixon v. Antonio Marquis “L.A.” Reid, 1:23-cv-09878-JAV —*
Letter Motion for Leave to File Redacted Letter Re: Spoliation Review
and Exhibits Under Seal**

Dear Judge Vargas:

We are counsel to Plaintiff Drew Dixon (“Ms. Dixon”). Pursuant to Your Honor’s Individual Rule and Practice in Civil Cases 10(c)(i), we write to seek leave to file a redacted version of Ms. Dixon’s Letter to Court Regarding Spoliation Review of Defendant’s Devices and to file under seal the following documents:

- Exhibit B, Defendant’s text messages with Karen Kwak, R000542;
- Exhibit C, Defendant’s text messages with Karen Kwak produced by Kroll, C-IMG004454;
- Exhibit D, Defendant’s November 11, 2024 deposition transcript;
- Exhibit E, Defendant’s text messages with Gee Roberson, R000533;
- Exhibit F, Defendant’s text messages with Gee Roberson produced by Kroll, C-IMG009445;
- Exhibit G, Defendant’s text messages with female subordinate, C-IMG0021571;
- Exhibit H, Defendant’s text messages with Mark Shimmel, C-IMG010453.

Exhibits B-G are documents or deposition testimony discussing documents which were designated by Defendant Antonio Marquis “L.A.” Reid (“Defendant”) as “Confidential” under the April 23, 2024 Protective Order entered in this action (ECF No. 44). We have notified Defendant’s counsel of our intent to file these documents and that they have three business days to file a letter explaining the need to seal or redact the documents.

Respectfully submitted,

/s/ Kenya K. Davis
Kenya K. Davis
Counsel for Plaintiff Drew Dixon